Russell Greer PO BOX 46602 LAS VEGAS, NV 89114 801-895-3501 russmark@gmail.com Pro Se Litigant

### IN THE DISTRICT COURT FOR

### IN AND FOR THE STATE OF NEVADA

# ANGELA WILLIAMS ET AL,

**Plaintiffs** 

V.

### STEVE SISOLAK ET AL.

Defendants

## PROPOSED INTERVENOR'S ERRATA TO DOC 182

Case No.: 28:1343

Judge Andrew P Gordon

Magistrate Judge Cam Ferenbach

Proposed Intervenor Russell Greer hereby submits this Errata to Doc 182.

#### **ERRATA**

Proposed intervenor makes the following corrections to his Motion for Reconsideration and said changes should replace the relevant sections in Doc 182:

Page 5, Paragraph 2: it's meant to read "strong-arm" and not "strongmen".

Page 6, second paragraph: the following clarification to that paragraph is made, with changes reflected in italics: Greer seeks to intervene to file a motion for sanctions that would allow Greer to collect fees against Angela Williams-Jason Guinasso, per Nev. Rev. Stat. § 18.010(2)(b) (when the court finds that the claim...was brought or maintained without reasonable ground), collect fees pursuant to FRCP 11(C)(1) against Jason Guinasso and the law firm of Hutchinson & Steffan and a declaratory order that the current case was frivolous and that Guinasso is bringing forth frivolous lawsuits, so that Greer can take that order to the Nevada State Bar. Greer should be allowed as a pro se litigant to collect attorneys fees because of the goals of FRCP 11. See: Rynkiewicz v. Jeanes Hosp., Civ. A. No. 86-5209, 1987 WL 7842 (E.D. Pa. Mar. 11, 1987) (awarding attorney fees to pro se litigant in light of Rule Il's goals).

Dated 10-18-22

Respectfully submitted,

Russell Greer

Pro Se Litigant

/rgreer/

# **CERTIFICATE OF SERVICE**

<u>I</u>hereby certify that I electronically filed the foregoing ERRATA, with the Clerk of the Court by using email.

I certify that the following participants in this case are registered electronic filing systems users and will be served electronically.